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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

|                           |   |                                      |
|---------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA, | ) | CASE NO. 3:17-CR-103 VC              |
|                           | ) |                                      |
| Plaintiff,                | ) | AMENDED STIPULATION AND              |
|                           | ) | [PROPOSED] ORDER CONTINUING DATE FOR |
| v.                        | ) | STATUS CONFERENCE AND EXCLUDING      |
|                           | ) | TIME UNDER THE SPEEDY TRIAL ACT      |
| KARIM BARATOV,            | ) |                                      |
|                           | ) |                                      |
| Defendant.                | ) |                                      |

The parties respectfully and jointly request that the next status conference, currently set for October 24, 2017, be moved to November 28, 2017. The reason for this request is to provide the parties additional time to determine whether a pre-trial resolution is possible and to provide defense counsel additional time to review discovery. Specifically, since the initial status conference on August 29, 2017, the parties have been meeting and conferring, and believe that the requested additional time would be helpful, to determine whether a pre-trial resolution is possible. Additionally, defense counsel is continuing to review the discovery provided by the United States, including the approximately 39 GB of discovery under the Protective Order that the United States provided on September 21, 2017. Therefore, the parties stipulate that additional time is needed for ongoing discovery, effective preparation, and

1 conferring to determine whether a pre-trial resolution is possible. Accordingly, the parties respectfully  
 2 and jointly request the resetting of the next status conference to November 28, 2017.

3 The parties also respectfully and jointly request that time be excluded under the Speedy Trial Act  
 4 between October 24, 2017, which is the date of the currently scheduled status conference, and  
 5 November 28, 2017, as the ends of justice from such an exclusion outweigh the best interest of the  
 6 public and the defendant in a speedy trial. Specifically, such an exclusion provides defense counsel  
 7 reasonable time for effective preparation, taking into account due diligence. 18 U.S.C. § 3161(h)(7)(A)  
 8 and (h)(7)(B)(iv).

9 IT IS SO STIPULATED.

10 DATED: October 23, 2017

*/s/ with permission*  
 ANDREW MANCILLA  
 ROBERT M. FANTONE  
 Counsel for Defendant

BRIAN J. STRETCH  
 United States Attorney

14 DATED: October 23, 2017

*/s/ Jeffrey Shih*  
 JEFFREY SHIH  
 Assistant United States Attorney

17 **[PROPOSED] ORDER TO CONTINUE STATUS CONFERENCE AND TO EXCLUDE TIME**

18 Based on the stipulation of the parties and on good cause shown, the Court orders that (1) the  
 19 next status conference, currently set for October 24, 2017, is hereby moved to November 28, 2017; and  
 20 (2) the time period from October 24, 2017, through November 28, 2017, is hereby excluded under the  
 21 Speedy Trial Act as the ends of justice from such an exclusion outweigh the best interest of the public  
 22 and the defendant in a speedy trial because such an exclusion provides defense counsel reasonable time  
 23 for effective preparation, taking into account due diligence. 18 U.S.C. § 3161(h)(7)(A) and  
 24 (h)(7)(B)(iv).

25 IT IS SO ORDERED.

26 Dated: October \_\_\_\_, 2017

HONORABLE VINCE CHHABRIA  
 UNITED STATES DISTRICT JUDGE